

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Warren Steel Holdings - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region V

**Subject:** POLREP #10  
Progress  
Warren Steel Holdings  
C5AV  
Warren, OH  
Latitude: 41.2629796 Longitude: -80.7990185

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**From:** Stephen Wolfe, OSC

**Date:** 9/5/2018

**Reporting Period:** 07/30/2018 through 08/31/2018

## 1. Introduction

### 1.1 Background

<b>Site Number:</b>	C5AV	<b>Contract Number:</b>	
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	2/20/2018
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Time-Critical
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	4/24/2018	<b>Start Date:</b>	4/24/2018
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>	OH0011207	<b>RCRIS ID:</b>	OHD066060608
<b>ERNS No.:</b>		<b>State Notification:</b>	yes
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

#### 1.1.1 Incident Category

Time Critical Removal Action

NOTE: POLREPS 1 and 2 were for emergency response actions (initial and final) that occurred 04/27/17 through 6/02/2017

#### 1.1.2 Site Description

WSH is a former 400-acre steel manufacturing facility. The site was in operation from at least the 1940s, and all operations official ceased at the facility in January 2016. EPA is gathering all drums and containers of hazardous waste that was abandoned at the facility as well as inspecting approximately 100 transformers for possible pcb oil/threat to waterway.

##### 1.1.2.1 Location

4000 Mahoning Street, Warren, Ohio.

##### 1.1.2.2 Description of Threat

EPA and Ohio EPA documented abandoned drums/totes/other containers containing hazardous waste (corrosives, pcb oil, used oil) at the site. EPA performed a site assessment on April 27, 2017 and documented that some of the material had a pH of 1-2 standard units and 14 standard units. A sample of oil from a pit on the site tested positive for pcbs at 90 ppm. Labeling is present on the majority of the containers indicating sulfuric acid, caustics, and water treatment chemicals.

Approximately 100 transformers are present on site, half of which are located near the bank of the Mahoning River. No data is available on whether or not the transformers contain oil/pcb oil. EPA will

investigate the transformers as part of the Removal Action and handle appropriately.

### 1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Information from Ohio EPA and the EPA site assessment indicated the presence of caustic material (acid and bases) as well as used, oil, and pcb contaminated oil. The EPA site assessment noted the presence of possible asbestos containing materials; however, asbestos removal is not a part of this removal action. EPA will address any loose asbestos if the material inhibits the ability to gather the containers of hazardous waste.

## 2. Current Activities

### 2.1 Operations Section

#### 2.1.1 Narrative

This is a Time Critical Removal Action focusing on the removal of drums and other containers of hazardous waste. Electrical Transformers will also be inspected to determine if they are full of oil/pcb oil.

#### 2.1.2 Response Actions to Date

From July 30th through August 24th, 2018 ERRS arranged for transportation and disposal of CERCLA wastes. ERRS, received bids for transformer work and selected the winning bid. ERRS is coordinating final paperwork with subcontractor and arranging for scheduling with the subcontractor.

During the week of July 30th, 2018, EPA was at the site for a site walk with potential bidders for the transformer work. In addition, EPA met with a subcontractor for the removal of bulk oil for sampling purposes.

During the week of August 13th, 2018 EPA and ERRS performed a site walk (new RM) and 1 vacuum box (12 tons) of K061 waste was transported off site for treatment and disposal.

On Monday, August 27th, 2018, 1 vacuum box (12 tons) of K061 waste was transported off site for treatment and disposal. An ERRS subcontractor removed approximately 3,000 gallons of waste oil from pits located inside one of the on-site buildings. ERRS continued cutting empty drums/totes for disposal.

On Tuesday, August 28th, 2018, 1 roll-off box (12 tons) of K061 waste was transported off site for treatment and disposal. An ERRS subcontractor removed approximately 3,000 gallons of waste oil from pits and waste oil tanks located inside one of the on-site buildings. 107 drums of waste oil/grease was transported off site for disposal. ERRS continued cutting empty drums/totes for disposal. A local company removed 19 cubic yard bags of carbon material from the site for re-use. EPA and START began marking PCB contaminated transformers on the site for draining/removal.

On Wednesday, August 29th, 2018 1 roll-off box (12 tons) of K061 waste and one empty roll-off box was transported off site for treatment and disposal. An ERRS subcontractor removed approximately 500 gallons of waste oil from pits and waste oil tanks located inside one of the on-site buildings. 51 drums, 3 totes and 5 cubic yard boxes of various wastes was transported off site for disposal. One hopper (2 tons) of calcium carbide was transported off site to the manufacturer for re-use. One roll-off box of non-hazardous waste (site accumulated debris) was transported off site for disposal. EPA and START completed marking PCB contaminated transformers on the site for draining/removal. ERRS continued cutting empty drums/totes for disposal.

On Thursday, August 30th, 2018, 17 totes 2 large acid batteries, and 2 drums of waste were transported off site for disposal. ERRS continued cutting empty drums/totes for disposal. ERRS began cleaning up the waste staging area (plastic, boom, etc). ERRS completed cutting empty drums/totes for disposal.

On Friday, August 31, 2018, completed general site clean-up. Heavy equipment was demobilized from the site and one roll-off box of non-hazardous waste (site accumulated debris) was transported off site for disposal. ERRS and EPA demobilized from site awaiting scheduling for draining/removal of pcb transformers.

START provided air monitoring and oversight support throughout the week as needed.

#### 2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Ongoing.

#### 2.1.4 Progress Metrics

<i><b>Waste Stream</b></i>	<i><b>Medium</b></i>	<i><b>Quantity</b></i>	<i><b>Manifest #</b></i>	<i><b>Treatment</b></i>	<i><b>Disposal</b></i>
Bulk Solids	Solid	84 tons	NA	re-use - ESSIX Resources	NA
Cylinders	Solid	38	NA	recycling	Airgas
Cylinders	Solid	10	NA	recycling	Praxair
Non-Haz Site Debris	Solid	80 tons	Various	landfill	American Landfill, Waynesburg, Ohio
K061 Waste	Solid	96 tons	Various	stabilization/landfill	U.S. Ecology, Bellevue, Michigan
Fire Extinguishers	each	200	NA	re-use/recycling	Fire Extinguisher Service and Sales, Cleveland,

					Ohio
93% Sulfuric Acid	liquid	1,625 gallons	NA	re-use - UNIVAR	NA
Hypochlorite Solution	liquid	650 gallons	NA	re-use - UNIVAR	NA
Asbestos	solid	20 pounds	NA	landfill	American Landfill, Waynesburg, Ohio
Calcium Carbide	solid	2 tons	NA	re-use ESM Resources	NA
Waste oil	liquid	6,500 gallons	NA	disposal	Safety-Kleen Systems, Kent, Ohio
Waste oil/grease	liquid/solid	107 drums	005038600FLE	disposal	EQ Detroit, Detroit, MI
Acid Waste Stream	liquid	5 drums, 6 totes	19223918JJK 19223938JJK	disposal	Chemtron Corp, Avon Ohio
Basic Waste Stream	liquid	9 drums 3 totes	19223918JJK 19223938JJK	disposal	Chemtron Corp, Avon Ohio
Hydrogen Peroxide	liquid	2 drums	19223918JJK	disposal	Chemtron Corp, Avon Ohio
Flammable	liquid	2 drums	19223918JJK	disposal	Chemtron Corp, Avon Ohio
paint material (oil based, latex, aerosols)	liquid	1 drum, 5 cubic yard	19223918JJK	disposal	Chemtron Corp, Avon Ohio
PCB	solid	1 cubic yard	019223919JJK	disposal	Wayne Disposal Inc, Belleville, MI
PCB	liquid	1 tote	019223920JJK	disposal	Veolia Technical Solutions, Port Arthur Texas
lead acid batteries	solid	600 pounds	19223938JJK	disposal	Chemtron Corp, Avon Ohio
miscellaneous	liquid	36 drums, 11 totes	19223918JJK 19223938JJK	disposal	Chemtron Corp, Avon Ohio

## 2.2 Planning Section

### 2.2.1 Anticipated Activities

T&D of remaining waste  
Drain/remove pcb contaminated transformers

#### 2.2.1.1 Planned Response Activities

Complete T&D of waste  
Drain transformers containing pcb contaminated oil

#### 2.2.1.2 Next Steps

Finalize T&D of unused HILTI strips  
schedule transformer work

### 2.2.2 Issues

T&D of unused portions of HILTI strips (D003 Explosive) is awaiting on scheduling at the disposal facility. ERRS is exploring other options for disposal. Four 5-gallon buckets (approximately 120 pounds) total.

## 2.3 Logistics Section

ERRS provided all logistics for the site

## 2.4 Finance Section

### 2.4.1 Narrative

EPA Branch Chief verbally authorized a \$50,000 ceiling for the Emergency Response phase.

An Action Memo was signed on February 2, 2018 for the time critical removal action with a ceiling limit of \$1,878,830 for removal actions. A delivery order was issued to ERRS for \$300,000 to begin response actions.

On May 22 the ERRS Ceiling was increased to \$425,000.

On July 11 the START ceiling was increased to \$43,850

On July 17, 2018 the OSC requested and management approved an ERRS ceiling increase of \$250,000 (new ceiling \$675,000)

### Estimated Costs \*

	Budgeted	Total To Date	Remaining	% Remaining
<b>Extramural Costs</b>				
ERRS - Cleanup Contractor	\$675,000.00	\$400,000.00	\$275,000.00	40.74%
TAT/START	\$43,850.00	\$35,000.00	\$8,850.00	20.18%
<b>Intramural Costs</b>				
<b>Total Site Costs</b>	<b>\$718,850.00</b>	<b>\$435,000.00</b>	<b>\$283,850.00</b>	<b>39.49%</b>

\* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

## 2.5 Other Command Staff

### 2.5.1 Safety Officer

Safety briefings are held before the start of every workday and at the end of the work day

### 2.5.2 Liaison Officer

OSC Steve Wolfe

### 2.5.3 Information Officer

OSC Steve Wolfe

## 3. Participating Entities

### 3.1 Unified Command

OSC Steve Wolfe

### 3.2 Cooperating Agencies

## 4. Personnel On Site

1 EPA  
1 START  
5 ERRS

## 5. Definition of Terms

No information available at this time.

## 6. Additional sources of information

### 6.1 Internet location of additional information/report

response.epa.gov/WSH

### 6.2 Reporting Schedule

## 7. Situational Reference Materials

NCP and CERCLA.